

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
Eastern Division (Youngstown)**

Susan Beiersdorfer, <i>et al.</i> ,	)	
Plaintiffs,	)	
v.	)	Case No. 4:19-cv-00260
Frank LaRose, Secretary of State, <i>et al.</i> ,	)	Judge Pearson
Defendants.	)	
	)	

\* \* \* \* \*

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND IN OPPOSITION TO FRANKLIN COUNTY BOARD OF ELECTIONS'  
MOTION TO DISMISS**

Now come Plaintiffs Susan Beiersdorfer *et al.*, by and through counsel, and move the Court for leave to respond in opposition to the Motion to Dismiss of Defendant Franklin County Board of Elections on or before March 18, 2020

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**Memorandum**

On February 19, 2020, Defendant Franklin County Board of Elections filed a Motion to Dismiss (Dkt. No. 78). It is a potentially dispositive motion and by the Court's local rule, Plaintiffs must respond by March 4, 2020.. However, Plaintiffs' counsel is presently heavily

involved in preparations for a major zoning case and a federal agency rulemaking and requires additional time to complete a meaningful response to the Motion to Dismiss. Defendants Meigs, Athens and Medina counties all have filed competing motions to dismiss within the past 2 days in this litigation, and Plaintiffs' counsel are considering a combined response for greater efficiency of use of the Court's resources.

Plaintiffs' counsel has consulted with the Franklin County Board of Elections' counsel, who does not oppose this request.

WHEREFORE, Plaintiffs pray the Court grant them until March 18, 2020 by which time to respond to Franklin County Board of Elections' Motion to Dismiss.

/s/ Terry J. Lodge  
Terry J. Lodge, Esq.  
Co-Counsel for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2020, I deposited a copy of the foregoing Motion in the Electronic Case Filing system maintained by the Court, and that according to protocols of the system, it was electronically served upon all counsel registered to receive electronic filings.

/s/ Terry J. Lodge  
Terry J. Lodge, Esq.  
Co-Counsel for Plaintiffs